

# **Exhibit 8**

## Hang Le

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**From:** Diana Esquivel <Diana.Esquivel@doj.ca.gov>  
**Sent:** Friday, November 22, 2024 11:02 AM  
**To:** Shannon Gustafson; Leslie De Leon; Amy R. Margolies; Gloria Pence  
**Cc:** Hang Le; dalekgalipo@yahoo.com; Santiago Laurel  
**Subject:** RE: L.C., et al. (Puga) v. State of California- Request to Meet and confer on Plaintiff depositions

Good morning,

The State defendants do not agree to forego the depositions of the minors regardless if they do not testify at trial. Given the amount of damages plaintiffs are seeking and the likelihood that the minors' mothers will testify about the strong bond between Puga and his children, the State intends to take the children's depositions. I request that we schedule a conference call to meet and confer about this matter if the minors will not be produced for deposition absent a court order. I recently litigated this issue, and the Magistrate Judge permitted the depositions of the minors (ages 5, 7, 12), with some restrictions on time and manner, who were *not* parties but witnessed the incident. Here, the minors being plaintiffs is an even more compelling reason for permitting their depositions.

Also, I would like to discuss an extension of the fact discovery deadline to Feb. 20 when expert discovery closes. An extension to Feb. 20 should not affect any of the other scheduling deadlines. I don't think we can complete all the depositions needed before Jan. 2 deadline. The State def's intend to notice the depositions of the medical providers for the Bottens and the paramedics that treated them at the scene. Given the upcoming holidays, it will not be possible to complete this discovery in the time remaining.

I propose discussing these issues during the depositions that are scheduled for Monday and Tuesday, while we're all on Zoom. Let me know your thoughts.

Thanks,

-Diana

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**From:** Shannon Gustafson <sgustafson@lynberg.com>  
**Sent:** Friday, November 22, 2024 10:16 AM  
**To:** Leslie De Leon <ldeleon@galipolaw.com>; Diana Esquivel <Diana.Esquivel@doj.ca.gov>; Amy R. Margolies <amargolies@lynberg.com>; Gloria Pence <gpence@lynberg.com>

**Cc:** Hang Le <hlee@galipolaw.com>; dalekgalipo@yahoo.com; Santiago Laurel <slaurel@galipolaw.com>

**Subject:** RE: L.C., et al. (Puga) v. State of California- Request to Meet and confer on Plaintiff depositions

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Hang,

I would like to meet and confer as to whether Plaintiff intends to call AL, IH and/or LI to testify at the time of trial. If that is the case then we would request dates to schedule their depositions before the January 2 discovery cut off. If counsel represents they will not be testifying then we do not need their depositions.

Thanks

**Shannon L. Gustafson**

Shareholder

Direct: (714) 352-3547



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**From:** Leslie De Leon <[ldeleon@galipolaw.com](mailto:ldeleon@galipolaw.com)>

**Sent:** Thursday, November 21, 2024 3:38 PM

**To:** Diana Esquivel <[Diana.Esquivel@doj.ca.gov](mailto:Diana.Esquivel@doj.ca.gov)>; Shannon Gustafson <[sgustafson@lynberg.com](mailto:sgustafson@lynberg.com)>; Amy R. Margolies <[amargolies@lynberg.com](mailto:amargolies@lynberg.com)>; Gloria Pence <[gpence@lynberg.com](mailto:gpence@lynberg.com)>

**Cc:** Hang Le <[hlee@galipolaw.com](mailto:hlee@galipolaw.com)>; dalekgalipo@yahoo.com; Santiago Laurel <[slaurel@galipolaw.com](mailto:slaurel@galipolaw.com)>

**Subject:** L.C., et al. (Puga) v. State of California

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Counsel,

Attached, please find the following:

**PLAINTIFF L.C.'S SUPPLEMENTAL RESPONSES TO DEFENDANT COUNTY OF SAN BERNARDINO'S INTERROGATORIES  
(SET THREE)**

**PLAINTIFF A.L.'S SUPPLEMENTAL RESPONSES TO DEFENDANT COUNTY OF SAN BERNARDINO'S INTERROGATORIES  
(SET THREE)**

**PLAINTIFF I.H.'S SUPPLEMENTAL RESPONSES TO DEFENDANT COUNTY OF SAN BERNARDINO'S INTERROGATORIES (SET THREE)**

**PLAINTIFFS L.C., I.H., AND A.L. 'S SUPPLEMENTAL RESPONSES TO DEFENDANT COUNTY OF SAN BERNARDINO'S REQUESTS FOR PRODUCTION OF DOCUMENTS (SET THREE)**

**PLAINTIFF A.L.'S THIRD SUPPLEMENTAL RESPONSES TO DEFENDANT COUNTY OF SAN BERNARDINO'S REQUESTS FOR PRODUCTION**

**DECLARATION OF SERVICE**

**Plaintiff 0243 – 0254, and**

**Plaintiff 0255**

Please advise if you have any issues viewing or downloading the attachments.

**Best Regards,**  
**Leslie R. De Leon**

**Leslie R. De Leon, Litigation Assistant | The Law Offices of Dale K. Galipo |** 21800 Burbank Blvd., Suite 310, Woodland Hills, CA 91367 | Office: +1.818.347.3333 | Fax: +1.818.347.4118 | Email: [ldleon@galipolaw.com](mailto:ldleon@galipolaw.com)

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